

FILED
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U.S. DISTRICT COURT E.D.N.Y.

★ **MAR 29 2023** ★

MRM:BTK
F. #2023R00203

LONG ISLAND OFFICE

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
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UNITED STATES OF AMERICA

- against -

CHRISTIAN BRAZOBAN,
also known as "Bison,"

Defendant.

I N D I C T M E N T

Cr. No. **CR 23 138**

(T. 18, U.S.C., §§ 875(c), 981(a)(1)(C),
2252(a)(2), 2252(b)(1), 2253(a), 2253(b),
2 and 3551 et seq.; T. 21, U.S.C.,
§ 853(p); T. 28, U.S.C., § 2461(c))

-----X

THE GRAND JURY CHARGES:

ACK, J.

COUNTS ONE THROUGH FOUR
(Distribution of Child Pornography)

LOCKE, M. J.

1. On or about the dates and times set forth below, within the Eastern District of New York and elsewhere, the defendant CHRISTIAN BRAZOBAN, also known as "Bison," together with others, did knowingly and intentionally distribute one or more visual depictions, to wit: electronic messages containing images and videos depicted in the following computer files:

<u>COUNT</u>	<u>FILE NAME</u>	<u>APPROXIMATE DATE AND TIME</u>
ONE	"IMG_0064.heic"	March 3, 2023, 1:53 p.m. EST
TWO	"IMG_0065.heic"	March 3, 2023, 1:54 p.m. EST
THREE	"IMG_0067.heic"	March 3, 2023, 1:55 p.m. EST
FOUR	"RecordIt-7633F358-427F-4790-8C98-19A16DCFD7E8.mov"	March 3, 2023, 2:15 p.m. EST

using a means and facility of interstate and foreign commerce, and which visual depictions had been mailed, and had been shipped and transported in and affecting interstate and foreign

commerce, and which contained materials which had been mailed and so shipped and transported, by any means including by computer, the production of such visual depictions having involved the use of one or more minors engaging in sexually explicit conduct, and such visual depictions were of such conduct.

(Title 18, United States Code, Sections 2252(a)(2), 2252(b)(1), 2 and 3551 et seq.)

COUNT FIVE
(Transmission of Threats to Injure)

2. On or about March 3, 2023, within the Eastern District of New York and elsewhere, the defendant CHRISTIAN BRAZOBAN, also known as “Bison,” did knowingly and willfully transmit in interstate commerce and foreign commerce, using an Internet-based electronic communications service, one or more electronic communications containing threats to injure the person of another, to wit:

- (a) “lil girl shot dead on Long Island.”
- (b) “I’m thinkin I tie you and just beat you to death with a mallet.”
- (c) “might even f**k your dead body.”

(Title 18, United States Code, Sections 875(c) and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION
AS TO COUNTS ONE THROUGH FOUR

3. The United States hereby gives notice to the defendant that, upon his conviction of any of the offenses charged in Counts One through Four, the government will seek forfeiture in accordance with Title 18, United States Code, Section 2253(a), which requires the forfeiture of (a) any visual depiction described in Sections 2251, 2251A, 2252, 2252A, 2252B or 2260 of Title 18, United States Code, or any book, magazine, periodical, film, videotape or other

matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of such sections; (b) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offenses; and (c) any property, real or personal, used or intended to be used to commit or to promote the commission of such offenses or any property traceable to such property, including, but not limited to the following assets seized from the defendant's residence in the Bronx, New York on or about March 15, 2023:

- (a) one blue Apple iPhone 12 with serial number F17G41Y40DXT;
- (b) one Samsung Orbic cellular telephone with serial number RC609L0922001097;
- (c) one HP laptop computer with serial number CND8427357; and
- (d) one Apple laptop with serial number FVFZ2FS2L40Y.

4. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be

divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253(b), to seek forfeiture of any other

property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Sections 2253(a) and 2253(b); Title 21, United States Code, Section 853(p))

CRIMINAL FORFEITURE ALLEGATION
AS TO COUNT FIVE

5. The United States hereby gives notice to the defendant that, upon his conviction of the offense charged in Count Five, the government will seek forfeiture in accordance with Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), which require any person convicted of such offense to forfeit any property, real or personal, constituting, or derived from, proceeds obtained directly or indirectly as a result of such offense.

6. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or

(e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 981(a)(1)(C); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c))

A TRUE BILL


FOREPERSON

By Carolyn Pokorny, Assistant U.S. Attorney

BREON PEACE
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

F.#: 2023R00203
FORM DBD-34
JUN. 85

No.

UNITED STATES DISTRICT COURT

EASTERN *District of* NEW YORK

CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.

CHRISTIAN BRAZOBAN,
also known as "Bison,"

Defendant.

INDICTMENT

(T. 18, U.S.C., §§ 875(c), 981(a)(1)(C), 2252(a)(2), 2252(b)(1), 2253(a), 2253(b), 2 and
3551 et seq.; T. 21, U.S.C., § 853(p); T. 28, U.S.C., § 2461(c))

A true bill.



Foreperson

Filed in open court this _____ *day,*

of _____ *A.D. 20* _____

Clerk

Bail, \$ _____

Bradley T. King, Assistant U.S. Attorney (631) 715-7900